



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Idaho Asphalt Supply, Inc.
Blackfoot, Idaho

Inspection Date: July 20, 2022

Report Author Signature

Date

Bryan Lange
U.S. Environmental Protection Agency, Contract Inspector
Eastern Research Group

Peer Review Signature

Date

Elly Walters
CAA/TRI Enforcement Officer
EPA Region 10

Section Chief Signature

Date

Derrick Terada
ATES Section Chief
EPA Region 10

Table of Contents

1. Basic Facility and Inspection Information.....	3
2. Compliance History	4
3. Records Review Prior To The Inspection.....	4
4. Inspection Elements/Order	5
a. Pre-Inspection Observations.....	5
b. Entry and Opening Conference	5
c. Biofilter.....	6
d. Benzene and Formaldehyde Throughput.....	6
e. The CB500 boiler	6
5. Facility Walk-Through	6
6. Closing Conference	7

Attachments

Attachment 1	EPA Region 10 Digital Image Log
Attachment 2	Idaho Air Quality Compliance Inspection, Preliminary Inspection Findings

1. Basic Facility and Inspection Information

Facility: Idaho Asphalt Supply, Inc.
75 N. 550 W. Trego Road
Blackfoot, ID 83405

AFS/FRS Number: Not available

State Facility ID: 011-00023

SIC: 5171 (Petroleum Bulk stations and Terminals)

NAICS: 424710 (Petroleum Bulk Stations and Terminals)

Permit Number: Idaho Permit to Construct No. P-060328

Facility Contacts: Terry Huber
Plant Manager
Idaho Asphalt Supply, Inc.
(208) 785-1797
THubler@IdahoAsphalt.com

Inspectors: Bryan Lange
U.S. Environmental Protection Agency, Contract Inspector
Eastern Research Group
1600 Perimeter Park Drive
Morrisville, NC 27560
(919) 622-2374
Bryan.Lange@erg.com

Shayne Aytes
Air Quality Compliance Officer
Idaho Department of Environmental Quality
Pocatello Regional Office
(208) 239-5009
Shayne.Aytes@deq.idaho.gov

Heidi Orr
Air Quality Compliance Officer
Idaho Department of Environmental Quality
Twin Falls Regional Office
(208) 737-3873
Heidi.Orr@deq.idaho.gov

Date of Inspection: July 20, 2022

Idaho Asphalt Supply, Inc.

Inspection Start/End Times: 9:30 am – 11:30 am MST

Inspection Notice: This was an announced inspection.

Mr. Lange phoned and emailed Terry Huber on July 14, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) Contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with its Permit-To-Construct (PTC) permit, NSPS subpart 40 CFR 60 Subpart Dc (Small Industrial-Commercial-Institutional Steam Generating Units), and 40 CFR 279 (Standards for the Management of Used Oil).

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Facility/Process Description:

The following facility description is based on information provided by a facility representative in the opening conference.

Idaho Asphalt Supply, Inc. stores, mixes, and distributes asphalt biners including the following: 1) asphalt cements, 2) polymer-modified asphalt cements, 3) asphalt cutbacks, and 4) asphalt emulsions.

Asphalt product is received by rail and exported by truck once it has been modified to meet the specifications of the contracted job.

2. Compliance History

June 21, 2017, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

Idaho Asphalt Supply Inc. is not registered in EPA's ECHO as of the date of this report.¹

3. Records Review Prior To The Inspection

Prior to inspection, Idaho DEQ shared copies of two items and each was reviewed:

- June 21, 2017 - Idaho report documenting an on-site inspection.

¹ See <https://echo.epa.gov/>

- September 28, 2007 - PTC No. P-060328 and statement of basis.

4. Inspection Elements/Order

a. Pre-Inspection Observations

Neither dust nor odors were noted prior to the scheduled inspection.

b. Entry and Opening Conference

Mr. Aytes, Ms. Orr, and Mr. Lange (“the inspectors”) arrived at 9:30 am MST on July 20, 2022. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA permit inspection. The inspectors explained that the inspection would consist first, of a review of the permit exemption conditions and second a walk-through where records related to permit exemption will be reviewed.

The inspectors explained that after the walk-through, they will leave a carbon copy of an Idaho DEQ Air Quality Compliance Inspection Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Mr. Aytes will keep the original.

The first topic of the opening conference was construction or operational changes that had occurred since the 2007 statement of basis. Mr. Huber explained that the following changes had occurred:

- Tank K, which originally contained hydrogenated adiponitrile now contains water.
- Tank 08, which originally contained cracked heavy oil alkyl amines has been removed.

Also discussed were the precautions taken to prevent particulate matter (PM) from becoming airborne. Mr. Huber explained that the facility periodically contracts with Dust Buster (a third-party vendor) to spray liquid magnesium chloride on the gravel roads to reduce PM fugitives. Magnesium chloride was last applied June 4, 2019. Paved roads are not an option, given that spilled asphalt can be difficult to remove from paved roads.

Permit condition 4.2 requires that facility-wide inspections of potential sources of fugitive emissions and visible emissions occur quarterly. Mr. Huber shared records of the most recent 2nd quarter inspection that occurred June 22, 2022.

In May 2022, a citizen called to complained about a natural gas odor. Staff did not attribute the natural gas odor to the asphalt operations and contacted the fire department. Staff wear a personal single-gas hydrogen sulfide detector on their hardhat to properly manage odors and safety.

Mr. Huber stated that no open burning occurs on-site.

c. Biofilter

Permit condition 4.2 requires that asphalt cement and polymer modified asphalt cement storage tanks are routinely routed to a biofilter. Mr. Huber indicated that vent lines from each storage tank go to one of the two facility biofilters.

Each biofilter systems is passive, each contain a 2-inch layer of wood bark, and each are equipped with misters to keep the bark wet. Every 5-years the bark is replaced. The approximate pressure drop across the system is 5-inches of water. The biofilters are not identical but have similar surface areas; one unit is 10 feet wide and 40 feet long.

d. Benzene and Formaldehyde Throughput

Permit conditions 3.4 and 4.4 require compliance with benzene and formaldehyde emission limits and benzene throughput limits. First, Mr. Huber indicated that no products received or sold contain formaldehyde.

Second, Mr. Huber shared 12-consecutive months (from July 2021 to June 2022) of benzene throughput calculations. Asphalt products sold (e.g., cutback, emulsions) are a mixture of ingredients. Three ingredients contain benzene (i.e., distillate #1, distillate #2, naphtha). Monthly calculations records showed product and benzene throughput totals. Benzene throughput never exceeded 1.5 gallon per month, an extrapolated annual worst-case throughput of 18 gallons is far below the permit limit [see excerpt below].

Table 4.2 BENZENE THROUGHPUT LIMITS

Emissions Units	Benzene Throughput (gal/yr)
Asphalt Emulsion Storage Tanks 44 through 55	252
Asphalt Emulsion Loading Racks LR 5, 6, and 8	252
Asphalt Cutback/Additive Storage Tanks 2, 22, 23, 26, and 28	159
Asphalt Cutback Loading Rack LR 3	51

[September 28, 2007]

e. The CB500 boiler

The CB500 boiler is no longer capable of burning used oil because the tank has been removed. It has not been burned on-site in 20-years.

Mr. Huber provided records documenting the amounts of fuel burned in the CB500 boiler. Mr. Huber explained that the natural gas fired in the CB500 boiler was pipeline quality and therefore less than the 0.5 percent sulfur (by weight) content limit.

5. Facility Walk-Through

The inspectors requested they be shown each step of the material handling, each boiler, and the biofilters. At approximately 11:00 am MST, the inspectors were escorted around the facility.

Mr. Huber led the inspectors to each step in the material handling path including the rail yard where the asphalt product is received, the storage tanks, boilers and hot-oil heaters. Boiler steam

Idaho Asphalt Supply, Inc.

and hot oil are necessary to keep reduce product (e.g., asphalt cutback, polymer modified asphalt) viscosity. The inspectors viewed the nameplate for each boiler. See Photographs 1 through 5 in attached photo log.

The walk-through included the observation of a truck loadout. See Photograph 6 in attached photo log.

The top portion of one biofilter had been removed to perform routine maintenance. See Photograph 7 in attached photo log. Visible in the photograph are the wood bark and spray nozzles.

The walk-through ended at approximately 11:20 am MST.

6. Closing Conference

At 11:20 am MST, our group gathered outside the administration building to discuss the inspection and conduct the closing conference. Mr. Lange led the closing conference and summarized the parts of the facility we had visited during the inspection, the records we had reviewed, and our observations related to CAA. Mr. Lange went through his inspection notes and explained that there were no areas of concern from the inspection.

Mr. Aytes presented Mr. Hubler with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF further documenting the inspection details and preliminary status of in-compliance at the time of the inspection. Mr. Aytes retained the original. See attachment 2.

The inspectors departed the facility at 11:30 am MST.

There are no post inspection activities related to the July 20, 2022, inspection.